

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 05- _____
v.	:	DATE FILED: _____
KAREN KOCH	:	
	:	VIOLATION:
	:	18 U.S.C. § 1341
		(mail fraud – 3 counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

BACKGROUND

1. SunGard Data Systems Inc. (hereinafter SunGard) is a corporation with its corporate headquarters located in Wayne, Chester County, Pennsylvania. SunGard provides many services including software and processing solutions to financial service providers, higher education, and the public sector, as well as disaster recovery services.
2. SunGard Recovery Services Inc., now known as SunGard Availability Inc, is a subsidiary of SunGard.
3. KCK Consulting Services (hereinafter “KCK”) is a fictitious company made up by defendant KAREN KOCH. The address used by defendant KOCH for KCK was her home address in North Wales, Pennsylvania.

4. Between in or about September 2002 and on or about August 15, 2005, defendant KAREN KOCH worked at SunGard Recovery Services Inc. From in or about September 2002 to in or about May, 2003, KOCH was assigned to work at SunGard through a temporary employment agency. In or about May 2003, KOCH was offered and accepted a full-time job with SunGard. In this role, she was responsible for processing and inputting invoices submitted by subcontractors who were working on project contracts.

THE SCHEME

5. From in or about March 2004 through in or about July 2005, defendant

KAREN KOCH

devised and intended to devise a scheme to defraud SunGard of more than \$148,560 and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

6. Defendant KAREN KOCH, while employed by SunGard, submitted and processed for payment, fraudulent invoices to SunGard for a fictitious company, KCK, which she had established.

7. Defendant KAREN KOCH caused checks to be written from the bank account of SunGard to pay these fraudulent invoices from the fictitious company KCK. These fraudulent payments totaled approximately \$148,560.00.

8. Defendant KAREN KOCH caused the unauthorized checks from SunGard to the fictitious company KCK to be mailed, using the United States mail, to her home address in North Wales, Pennsylvania.

9. On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, defendant

KAREN KOCH,

for the purpose of executing the scheme described above and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, checks from SunGard Recovery Services Inc. in payment to KCK Consulting, Inc. for invoices fraudulently created and processed by defendant KAREN KOCH, to North Wales, Pennsylvania, each mailing constituting a separate count, as set forth below.

COUNT	DATE	AMOUNT
1	April 8, 2004	\$4,800.00
2	December 3, 2004	\$9,600.00
3	June 24, 2005	\$8,400.00

All in violation of Title 18, United States Code, Section 1341.

PATRICK L. MEEHAN
United States Attorney